

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

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Plaintiff,

*

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v.

CRIMINAL NO. LKG-25-6

THOMAS C. GOLDSTEIN,

*

*

Defendant.

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**DEFENDANT THOMAS C. GOLDSTEIN'S MOTION TO SEAL CERTAIN
DOCUMENTS IN CONNECTION WITH HIS MOTION TO DISMISS THE
SUPERSEDING INDICTMENT FOR PROSECUTORIAL MISCONDUCT AND HIS
RESPONSE TO THE GOVERNMENT'S MOTION IN LIMINE TO ADMIT
PURPORTED BUSINESS RECORDS AND EXCLUDE WITHHELD DEFENSE
EVIDENCE**

Defendant Thomas C. Goldstein respectfully requests this Court to order that certain documents filed in connection with his (1) Motion to Dismiss The Superseding Indictment For Prosecutorial Misconduct and (2) Response To The Government's Motion In Limine To Admit Purported Business Records And Exclude Withheld Defense Evidence, be placed under seal. Specifically, he seeks leave to file under seal, with sealed copies served on the government, the following documents:

• Motion to Dismiss The Superseding Indictment For Prosecutorial

Misconduct: This motion contains highly sensitive personal information about Mr. Goldstein, certain witnesses who testified before the grand jury, and individuals who were discussed in those witnesses' testimony. Such sensitive personal information is required to be filed under seal pursuant to the Protective Order. *See ECF No. 29 ¶ 4; see also, e.g., In re Grand Jury Subpoena # 06-1, 274*

F. App'x 306, 308 n.1 (4th Cir. 2008). Because the motion would be essentially unreadable if confidential information were redacted, Mr. Goldstein seeks leave to file the entire document under seal.

- **Exhibits A through E to Motion to Dismiss The Superseding Indictment For**

Prosecutorial Misconduct: These exhibits are transcripts of grand jury testimony (Exhibits A, B, and E) and exhibits to that testimony (Exhibits C and D). These grand jury materials contain highly sensitive personal information about Mr. Goldstein, certain witnesses who testified before the grand jury, and individuals who were discussed in those witnesses' testimony. Such sensitive personal information is required to be filed under seal pursuant to the Protective Order. *See* ECF No. 29 ¶ 4; *see also*, e.g., *In re Grand Jury Subpoena # 06-1*, 274 F. App'x at 308 n.1. Because these exhibits would be essentially unreadable if confidential information were redacted, Mr. Goldstein seeks leave to file them entirely under seal.

- **Exhibit A to Response To The Government's Motion In Limine To Admit**

Purported Business Records And Exclude Withheld Defense Evidence: This exhibit contains documents produced by the government to the defense, and which include materials with sensitive personal information, including what appear to be bank records, travel records, and a rental application. This exhibit also reveals identifying information about potential witnesses. Such sensitive information is appropriately sealed pursuant to the Protective Order. *See* ECF No. 29 ¶ 4.

Accordingly, pursuant to Local Rule 207.2, Mr. Goldstein respectfully requests that the Court approve filing the above-listed documents under seal.

Dated: November 14, 2025

Respectfully submitted,

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